

PSJ3

Exhibit 580



January 6, 2011

E-Mail and Express Mail

Paul Farley, Vice President
National Accounts
Cardinal Health
7000 Cardinal Place
Dublin, Ohio 43017

RE: Cardinal Concerns About CVS # 0174, 1136, 2732, 2848 and 3639

Dear Paul:

CVS Caremark appreciates you meeting with us on December 2, 2010, and sharing your concerns about controlled substance purchases by several CVS pharmacies.

Since our meeting, CVS has undertaken actions to address your concerns about those specific pharmacies and to address suspicious ordering and dispensing generally. CVS has distributed guidelines that reinforce the company's position that pharmacists use their professional judgment when determining whether to fill prescriptions. The guidelines identify inappropriate prescription-seeking behavior and advise pharmacists how to minimize risk of dispensing for other than legitimate prescriptions.

CVS representatives also met with Drug Enforcement Administration and Florida Department of Health investigators regarding dispensing issues in Florida.

Teams of CVS Pharmacy Supervisors and Regional Loss Prevention Managers visited the following Florida pharmacies: CVS # 0174 (Daytona Beach), CVS # 1136 (Homestead), CVS # 2732 (Hollywood), CVS # 2848 (Pompano Beach) and CVS # 3639 (Bushnell). The teams interviewed pharmacy staff, reviewed controlled substance ordering, receiving and dispensing procedures, controlled substance records and reports, and security. The teams also audited certain drugs.

The teams found no evidence of controlled substance diversion or significant losses. CVS is confident that pharmacists and their staffs at these pharmacies understand how to minimize the risk of dispensing controlled substances, particularly opioids for pain management, for non-legitimate purposes.

CVS is comfortable with Cardinal continuing to ship controlled substances to these pharmacies and look forward to continuing to work with you to address matters of mutual concern. Please let me know if you still have concerns about these pharmacies or if you have concerns about others.

Sincerely,



Brian E. Whalen
Director, Pharmacy Merchandising

cc: Michael A. Mone – Cardinal Health
Karen O. Gibbs – CVS Caremark
Larry K. Houck – CVS Caremark

REVIEWED

By Christopher J. Forst at 9:14 am, Oct 27, 2010

EAST

Anti-Diversion Early Dialogue Profile

BF7368308 HOLIDAY CVS, L.L.C.

DEA LICENSE INFORMATION

DEA Number:	BF7368308		
Business Activity Code:	A	3	CHAIN PHARMACY
DEA Schedules:	22N	33N	4 5
License Expiration Date:	20101231		

CUSTOMER INFORMATION

HOLIDAY CVS, L.L.C. DBA: CVS/PHARMACY # 02848

2036 E. ATLANTIC BLVD.

POMPANO BEACH FL 33060 9547816785 9547816785

Dominant Accounting Class: CHAIN PHARMACY CVS

First Cardinal Account Created: 1/1/2001

Visited by QRA / # of Visits / Most Recent Visit:

PURCHASE PROFILE

The below metrics are aggregated based on the previous 12 months sales figures

# of Drug Families Purchased:	45	Hydrocodone	4,585
Total Rx Sales (\$):	\$1,323,896.94	Oxycodone	535,910
Control Substance (CS) Sales (\$):	\$439,920.17	Alprazolam	3,380
Rx Dosage Units Sold	1,072,389	Phentermine	600
CS Dosage Units Sold:	633,018	Carisoprodol	590
% CS Purchases	59.03%	Tramadol	1960
% AHOP CS Purchases	86.01%		
# of SOM Events (Family)	3		
Recent SOM Event (Family)	9/30/2010		

EARLY DIALOGUE INFORMATION

Drug Family:	9143	OXYCODONE HYDROCHLORIDE
Allocated Accrual:	47,700	Reviewed, no change.
Threshold Limit:	53,500	
% of Limit:	89	
Previous Month Max:		
% Variance (Max):		

HISTORICAL PURCHASE DATA

Oct 09	39,740	Apr 10	36,110
Nov 09	47,200	May 10	46,050
Dec 09	55,300	Jun 10	50,510
Jan 10	35,500	Jul 10	54,620
Feb 10	31,500	Aug 10	43,520
Mar 10	33,460	Sep 10	62,400

DISTRACK INFORMATION

K02	LK
11	BF7368308 9143

REGIONAL DEMOGRAPHICS

Region:	South	South Atlantic
County / Population:	BROWARD	1,623,018
Population of Zip	Income / Household	Median Age
33,389	\$34,060.00	36.10

REVIEW CHECKLIST

- Customer Profile
- Held Order
- AR Limit
- Shipped Report
- Ordered Report
- Release/Cancel Report
- Validate Order Limits
- Customer Inquiry
- SCI Repository Review
- Contact Customer

QRA DECISION

- Increase SOM Limits
- Decrease SOM Limits
- QRA Site Visit
- Sales Site Visit

Rausch, Nicholas

From: Saul, Amy
Sent: Monday, January 19, 2009 2:00 PM
To: Rausch, Nicholas; Dunham, Jennifer
Cc: Rymiszewski, Phil; Farley, Paul; Mone, Michael
Subject: RE: CVS Store for Review

Nick,

I just spoke to the pharmacist who submits C2 orders. He states there was a new pain clinic that opened a few blocks away. He is not sure when it opened. It is called Atlantic Medical Solutions (?) and he believes it is in the 900 block of North Federal Highway.

Amy Saul

Cardinal Health
Dublin, OH
National Accounts Retail
Phone 614-757-6554
Fax 614-553-5544

From: Rausch, Nicholas
Sent: Monday, January 19, 2009 9:44 AM
To: Dunham, Jennifer
Cc: Rymiszewski, Phil; Farley, Paul; Mone, Michael; Saul, Amy
Subject: RE: CVS Store for Review

Jennifer,

One additional item to note is that the store's purchases of Oxycodone products changed in June of 2008. Could you please find out what happened?

Thanks!

Nick

From: Rausch, Nicholas
Sent: Monday, January 19, 2009 9:29 AM
To: Dunham, Jennifer
Cc: Rymiszewski, Phil; Farley, Paul; Mone, Michael; Saul, Amy
Subject: CVS Store for Review

Jennifer,

Our DC personnel identified an order placed by a CVS store for Oxycodone products that warranted additional review. Specifically, CVS 02848 (DEA BF7368308) located in Pompano Beach, FL ordered 60 bottles of 100 count OXYCODONE HCL (NDC 00406853001). Although the quantity ordered did not create a threshold limit, the number of bottles ordered of this specific product varies from the store's normal purchase pattern.

We have reviewed this order here at Corporate and have determined that the store's purchases of Oxycodone products warrant additional review. Could you please reach out to CVS and ask that they review the Oxycodone purchases made by this store and let us know if: 1) the order was made in error; and/or 2) if their have been substantial utilization changes at the store?

Thanks!

Nicholas Rausch
Manager, Regulatory Management
Cardinal Health
7000 Cardinal Place
Dublin, Ohio 43017
614-757-3148 tel
614-652-8781 fax

Rausch, Nicholas

From: Saul, Amy
Sent: Monday, January 19, 2009 2:00 PM
To: Rausch, Nicholas; Dunham, Jennifer
Cc: Rymiszewski, Phil; Farley, Paul; Mone, Michael
Subject: RE: CVS Store for Review

Nick,

I just spoke to the pharmacist who submits C2 orders. He states there was a new pain clinic that opened a few blocks away. He is not sure when it opened. It is called Atlantic Medical Solutions (?) and he believes it is in the 900 block of North Federal Highway.

Amy Saul

Cardinal Health
Dublin, OH
National Accounts Retail
Phone 614-757-6554
Fax 614-553-5544

From: Rausch, Nicholas
Sent: Monday, January 19, 2009 9:44 AM
To: Dunham, Jennifer
Cc: Rymiszewski, Phil; Farley, Paul; Mone, Michael; Saul, Amy
Subject: RE: CVS Store for Review

Jennifer,

One additional item to note is that the store's purchases of Oxycodone products changed in June of 2008. Could you please find out what happened?

Thanks!

Nick

From: Rausch, Nicholas
Sent: Monday, January 19, 2009 9:29 AM
To: Dunham, Jennifer
Cc: Rymiszewski, Phil; Farley, Paul; Mone, Michael; Saul, Amy
Subject: CVS Store for Review

Jennifer,

Our DC personnel identified an order placed by a CVS store for Oxycodone products that warranted additional review. Specifically, CVS 02848 (DEA BF7368308) located in Pompano Beach, FL ordered 60 bottles of 100 count OXYCODONE HCL (NDC 00406853001). Although the quantity ordered did not create a threshold limit, the number of bottles ordered of this specific product varies from the store's normal purchase pattern.

We have reviewed this order here at Corporate and have determined that the store's purchases of Oxycodone products warrant additional review. Could you please reach out to CVS and ask that they review the Oxycodone purchases made by this store and let us know if: 1) the order was made in error; and/or 2) if their have been substantial utilization changes at the store?

Thanks!

Nicholas Rausch
Manager, Regulatory Management
Cardinal Health
7000 Cardinal Place
Dublin, Ohio 43017
614-757-3148 tel
614-652-8781 fax

Rausch, Nicholas

From: GMB-QRA-Anti-Diversion
Sent: Friday, January 16, 2009 11:29 AM
To: Mone, Michael; Forst, Christopher; Rausch, Nicholas
Subject: FW: Order of Interest BF7368308
Importance: High

From: Kurtz, Bob
Sent: Thursday, January 15, 2009 5:49 PM
To: Butler, Joyce; Simmons, Pam; GMB-QRA-Anti-Diversion
Subject: Order of Interest BF7368308
Importance: High

Customer # 024829 ordered a quantity of 60 of item # 3591377. This would have exceeded their previous months total by 18 bottles of 100.

Considering it is only the 15th of the month, I reduced the quantity of the ordered item by 24.

Bob Kurtz
Operations Supervisor
Lakeland Division-HSCS
863-686-3784 x7404

REVIEWED

By Christopher J. Forst at 11:16 am, May 27, 2010

EAST

Anti-Diversion Early Dialogue Profile

BF7368308 HOLIDAY CVS, L.L.C.

DEA LICENSE INFORMATION

DEA Number:	BF7368308		
Business Activity Code:	A	3	CHAIN PHARMACY
DEA Schedules:	22N 33N 4 5		
License Expiration Date:	20101231		

CUSTOMER INFORMATION

HOLIDAY CVS, L.L.C. DBA: CVS/PHARMACY # 02848

2036 E. ATLANTIC BLVD.
POMPANO BEACH FL 33060 9547816785 9547816785

Dominant Accounting Class: CHAIN PHARMACY CVS

First Cardinal Account Created: 12/7/2007

Visited by QRA / # of Visits / Most Recent Visit:

PURCHASE PROFILE

The below metrics are aggregated based on the previous 12 months sales figures

# of Drug Families Purchased:	51	Hydrocodone	5,280
Total Rx Sales (\$):	\$1,239,079.44	Oxycodone	496,490
Control Substance (CS) Sales (\$):	\$440,168.79	Alprazolam	4,100
Rx Dosage Units Sold	985,594	Phentermine	700
CS Dosage Units Sold:	585,107	Carisoprodol	600
% CS Purchases	59.00%	Tramadol	1720
% AHOP CS Purchases	51.00%		
# of SOM Events (Family)	1		
Recent SOM Event (Family)	8/27/2009		

EARLY DIALOGUE INFORMATION

Drug Family:	9143	OXYCODONE HYDROCHLORIDE
Allocated Accrual:	46,050	
Threshold Limit:	53,500	Reviewed, no change.
% of Limit:	86	
Previous Month Max:		
% Variance (Max):		

HISTORICAL PURCHASE DATA

May 09	31,500	Nov 09	47,200
Jun 09	40,400	Dec 09	55,300
Jul 09	43,100	Jan 10	35,500
Aug 09	54,200	Feb 10	31,500
Sep 09	48,480	Mar 10	33,460
Oct 09	39,740	Apr 10	36,110

DISTRACK INFORMATION

K02	LK
11	BF7368308 9143

REGIONAL DEMOGRAPHICS

Region:	South	South Atlantic
County / Population:	BROWARD	1,623,018
Population of Zip	Income / Household	Median Age
33,389	\$34,060.00	36.10

REVIEW CHECKLIST

- Customer Profile
- Held Order
- AR Limit
- Shipped Report
- Ordered Report
- Release/Cancel Report
- Validate Order Limits
- Customer Inquiry
- SCI Repository Review
- Contact Customer

QRA DECISION

- Increase SOM Limits
- Decrease SOM Limits
- QRA Site Visit
- Sales Site Visit

Anti-Diversion Customer Profile

BF7368308 HOLIDAY CVS, L.L.C.

REVIEWED

By Christopher J. Forst at 9:58 am, Aug 28, 2009

DEA LICENSE INFORMATION

DEA Number:	BF7368308	
Business Activity Code:	A	3
DEA Schedules:	22N	33N 45
License Expiration Date:	20101231	

CUSTOMER INFORMATION

HOLIDAY CVS, L.L.C. DBA: CVS/PHARMACY # 02848

2036 E. ATLANTIC BLVD.

POMPANO BEACH FL 33060

Dominant Accounting Class: CHAIN PHARMACY CVS

First Cardinal Account Created: 12/7/2007

Visited by QRA / # of Visits / Most Recent Visit:

PURCHASE PROFILE

The below metrics are aggregated based on the previous 12 months sales figures

# of Drug Families Purchased:	44	Hydrocodone	5,955
Total Rx Sales (\$):	\$1,229,347.96	Oxycodone	403,620
Control Substance (CS) Sales (\$):	\$429,585.79	Alprazolam	3,920
Rx Dosage Units Sold	923,514	Phentermine	500
CS Dosage Units Sold:	493,359	Carisoprodol	200
% CS Purchases	53.42%	Tramadol	1150
% AHOP CS Purchases	44.83%		
Total # of SOM Events:	1		
Most Recent SOM:			

SOM EVENT SPECIFIC INFORMATION

Drug Family:	9143	OXYCODONE HYDROCHLORIDE
# of Events:	1	
Overage date:	8/27/2009	Not unreasonable, no threshold change.
Total Accrual:	54,200	
Monthly Limit:	53,500	
Order#:	7497083	
Item#:	2409266	

HISTORICAL PURCHASE DATA

Aug 08	35,250	Feb 09	36,500
Sep 08	23,640	Mar 09	16,990
Oct 08	25,950	Apr 09	41,900
Nov 08	29,730	May 09	31,500
Dec 08	39,860	Jun 09	40,400
Jan 09	38,800	Jul 09	43,100

DISTRACK INFORMATION

K02	LK	24829
11	BF7368308	9143

REGIONAL DEMOGRAPHICS

Region:	South	South Atlantic
County / Population:	BROWARD	1,623,018
Population of Zip	Income / Household	Median Age
33,389	\$34,060.00	36.10

REVIEW CHECKLIST

- Customer Profile
- Held Order
- AR Limit
- Shipped Report
- Ordered Report
- Release/Cancel Report
- Validate Order Limits
- Customer Inquiry
- SCI Repository Review
- Contact Customer

QRA DECISION

- Release Order
- Cut Order
- Increase SOM Limits
- Report Order to DEA
- QRA Site Visit
- Sales Site Visit

REVIEWED

By Christopher J. Forst at 11:36 am, Sep 01, 2010

EAST

Anti-Diversion Customer Profile

BF7368308 HOLIDAY CVS, L.L.C.

DEA LICENSE INFORMATION

DEA Number:	BF7368308		
Business Activity Code:	A	3	CHAIN PHARMACY
DEA Schedules:	22N 33N 4 5		
License Expiration Date:	20101231		

CUSTOMER INFORMATION

HOLIDAY CVS, L.L.C.	DBA: CVS/PHARMACY # 02848		
2036 E. ATLANTIC BLVD.			
POMPANO BEACH	FL	33060	9547816785
Dominant Accounting Class:	CHAIN PHARMACY	CVS	
First Cardinal Account Created:	1/1/2001		
Visited by QRA / # of Visits / Most Recent Visit:			

PURCHASE PROFILE

The below metrics are aggregated based on the previous 12 months sales figures

# of Drug Families Purchased:	51	Hydrocodone	4,685
Total Rx Sales (\$):	\$1,288,049.28	Oxycodone	532,670
Control Substance (CS) Sales (\$):	\$453,764.88	Alprazolam	3,180
Rx Dosage Units Sold	1,039,275	Phentermine	500
CS Dosage Units Sold:	624,912	Carisoprodol	590
% CS Purchases	60.13%	Tramadol	2360
% AHOP CS Purchases	86.58%		
Total # of SOM Events:	2		
Most Recent SOM:	8/27/2009		

SOM EVENT SPECIFIC INFORMATION

Drug Family:	9143	OXYCODONE HYDROCHLORIDE
# of Events:	2	
Overage date:	8/31/2010	
Total Accrual:	56,120	
Monthly Limit:	53,500	
Order#:	1705800	
Item#:	3526621	

HISTORICAL PURCHASE DATA

Aug 09	54,200	Feb 10	31,500
Sep 09	48,480	Mar 10	33,460
Oct 09	39,740	Apr 10	36,110
Nov 09	47,200	May 10	46,050
Dec 09	55,300	Jun 10	50,510
Jan 10	35,500	Jul 10	54,620

DISTRACK INFORMATION

K02	LK	24829
11	BF7368308	9143

REGIONAL DEMOGRAPHICS

Region:	South	South Atlantic
County / Population:	BROWARD	1,623,018
Population of Zip	Income / Household	Median Age
33,389	\$34,060.00	36.10

REVIEW CHECKLIST

- Customer Profile
- Held Order
- AR Limit
- Shipped Report
- Ordered Report
- Release/Cancel Report
- Validate Order Limits
- Customer Inquiry
- SCI Repository Review
- Contact Customer

QRA DECISION

- Release Order
- Cut Order
- Increase SOM Limits
- Report Order to DEA
- QRA Site Visit
- Sales Site Visit

REVIEWED

By Christopher J. Forst at 9:46 am, Sep 24, 2010

EAST

Anti-Diversion Early Dialogue Profile

BF7368308 HOLIDAY CVS, L.L.C.

DEA LICENSE INFORMATION

DEA Number:	BF7368308		
Business Activity Code:	A	3	CHAIN PHARMACY
DEA Schedules:	22N	33N	45
License Expiration Date:	20101231		

CUSTOMER INFORMATION

HOLIDAY CVS, L.L.C. DBA: CVS/PHARMACY # 02848

2036 E. ATLANTIC BLVD.

POMPANO BEACH FL 33060 9547816785 9547816785

Dominant Accounting Class: CHAIN PHARMACY CVS

First Cardinal Account Created: 1/1/2001

Visited by QRA / # of Visits / Most Recent Visit: [redacted]

PURCHASE PROFILE

The below metrics are aggregated based on the previous 12 months sales figures

# of Drug Families Purchased:	44	Hydrocodone	5,385
Total Rx Sales (\$):	\$1,294,073.00	Oxycodone	521,990
Control Substance (CS) Sales (\$):	\$437,359.24	Alprazolam	3,080
Rx Dosage Units Sold	1,045,601	Phentermine	500
CS Dosage Units Sold:	618,980	Carisoprodol	590
% CS Purchases	59.20%	Tramadol	2160
% AHOP CS Purchases	85.78%		
# of SOM Events (Family)	2		
Recent SOM Event (Family)	8/31/2010		

EARLY DIALOGUE INFORMATION

Drug Family:	9143	OXYCODONE HYDROCHLORIDE
Allocated Accrual:	43,900	
Threshold Limit:	53,500	
% of Limit:	82	
Previous Month Max:		
% Variance (Max):		

HISTORICAL PURCHASE DATA

Sep 09	48,480	Mar 10	33,460
Oct 09	39,740	Apr 10	36,110
Nov 09	47,200	May 10	46,050
Dec 09	55,300	Jun 10	50,510
Jan 10	35,500	Jul 10	54,620
Feb 10	31,500	Aug 10	43,520

DISTRACK INFORMATION

K02	LK
11	BF7368308 9143

REGIONAL DEMOGRAPHICS

Region:	South	South Atlantic
County / Population:	BROWARD	1,623,018
Population of Zip	Income / Household	Median Age
33,389	\$34,060.00	36.10

REVIEW CHECKLIST

- Customer Profile
- Held Order
- AR Limit
- Shipped Report
- Ordered Report
- Release/Cancel Report
- Validate Order Limits
- Customer Inquiry
- SCI Repository Review
- Contact Customer

QRA DECISION

- Increase SOM Limits
- Decrease SOM Limits
- QRA Site Visit
- Sales Site Visit

REVIEWED

By Christopher J. Forst at 3:33 pm, Oct 13, 2010

EAST

Anti-Diversion Customer Profile

BF7368308 HOLIDAY CVS, L.L.C.

DEA LICENSE INFORMATION

DEA Number:	BF7368308		
Business Activity Code:	A	3	CHAIN PHARMACY
DEA Schedules:	22N 33N 4 5		
License Expiration Date:	20101231		

CUSTOMER INFORMATION

HOLIDAY CVS, L.L.C. DBA: CVS/PHARMACY # 02848

2036 E. ATLANTIC BLVD.

POMPANO BEACH FL 33060 9547816785 9547816785

Dominant Accounting Class: CHAIN PHARMACY CVS

First Cardinal Account Created: 1/1/2001

Visited by QRA / # of Visits / Most Recent Visit:

PURCHASE PROFILE

The below metrics are aggregated based on the previous 12 months sales figures

# of Drug Families Purchased:	44	Hydrocodone	5,385
Total Rx Sales (\$):	\$1,294,073.00	Oxycodone	521,990
Control Substance (CS) Sales (\$):	\$437,359.24	Alprazolam	3,080
Rx Dosage Units Sold	1,045,601	Phentermine	500
CS Dosage Units Sold:	618,980	Carisoprodol	590
% CS Purchases	59.20%	Tramadol	2160
% AHOP CS Purchases	85.78%		
Total # of SOM Events:	3		
Most Recent SOM:	8/31/2010		

SOM EVENT SPECIFIC INFORMATION

Drug Family:	9143	OXYCODONE HYDROCHLORIDE
# of Events:	3	
Overage date:	9/30/2010	Not unreasonable end-of-month order. Order released. No threshold change.
Total Accrual:	57,300	
Monthly Limit:	53,500	
Order#:	1959367	
Item#:	3591377	

HISTORICAL PURCHASE DATA

Sep 09	48,480	Mar 10	33,460
Oct 09	39,740	Apr 10	36,110
Nov 09	47,200	May 10	46,050
Dec 09	55,300	Jun 10	50,510
Jan 10	35,500	Jul 10	54,620
Feb 10	31,500	Aug 10	43,520

DISTRACK INFORMATION

K02	LK	24829
11	BF7368308	9143

REGIONAL DEMOGRAPHICS

Region:	South	South Atlantic
County / Population:	BROWARD	1,623,018
Population of Zip	Income / Household	Median Age
33,389	\$34,060.00	36.10

REVIEW CHECKLIST

- Customer Profile
- Held Order
- AR Limit
- Shipped Report
- Ordered Report
- Release/Cancel Report
- Validate Order Limits
- Customer Inquiry
- SCI Repository Review
- Contact Customer

QRA DECISION

- Release Order
- Cut Order
- Increase SOM Limits
- Report Order to DEA
- QRA Site Visit
- Sales Site Visit